WASTE MINIMIZATION AND COMPLIANCE REPORT (RCN 10-99-904)

- **1. PURPOSE:** The purpose of this Veterans Health Administration (VHA) Directive is to provide the format for reporting data on waste categories, volume, environmental compliance and initiatives to the Environmental Protection Agency (EPA) and identification of Veterans Integrated Service Network (VISN) opportunities in waste management. *NOTE:* This Directive eliminates multiple reporting.
- 2. BACKGROUND: The Resource Conservation and Recovery Act (RCRA) provides the authority for the establishment of a hazardous waste minimization plan. Executive Order (E.O.) 13101 requires the establishment of waste prevention, pollution prevention and recycling programs, and goals against which to measure the cost and environmental management of generated wastes. E.O. 12856 requires the submission of annual reports regarding the Emergency Planning and Community Right-to-Know Act and the Pollution Prevention Act. E.O. 12780 directs the promotion of cost-effective waste reduction and recycling activities and encourages integration within an established waste management program. VHA Policy Manual, M-I, Part VII, Chapter 14, Waste Management, defines waste categories and Program Guide 1850.1, Recycling Program, describes a model recycling program. This Directive is in consonance with the preceding regulatory requirements and the Department of Veterans Affairs (VA) commitment to promote environmentally sound practices.
- **3. POLICY:** A VHA healthcare facility waste management officer will serve as the recycling coordinator, compiling and submitting survey data in compliance with the reporting requirements of this Directive.

4. ACTION

- a. Each VHA healthcare facility waste management officer will use the attached Formats A through E to report data to VHA Headquarters.
- b. The report is to be submitted through the appropriate VISN (VISN ____/181C) to VHA Headquarters, Office of Facilities Management, 810 Vermont Avenue, NW, Washington, DC 20420, or to fax number (202) 565-4283.
- c. The report is to be submitted no later than October 31 of each year, i.e., the Fiscal Year (FY) 1999 report is due at close of business October 31, 1999. If no data is available to report, a negative report is required for each Format, A through E. *NOTE:* RCN 10-99-904 is assigned to the report.

5. REFERENCES

- a. Solid Waste Disposal Act, Public Law (Pub. L.) 89-272
- b. RCRA)of 1976, Pub. L. 94-580
- c. EPCRA of 1986, Pub. L. 99-499, The Superfund Amendments and Reauthorization Act of 1986, Sections 302-304 and 311-313.
 - d. Pollution Prevention Act of 1990, Pub. L. 101-453.
- e. E.O. 13101, Greening the Government Waste Through Waste Prevention, Recycling, and Federal Acquisition, September 14, 1998.
- f. E.O. 12856, Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements, August 3, 1993.
- g. E.O. 12780, Federal Agency Recycling and the Council on Federal Recycling and Procurement Policy, October 31, 1991.
 - h. M-I, Part VII, Chapter 14, Waste Management, September 14, 1994.
 - i. VHA Program Guide 1850.1, Recycling Program, January 28, 1998.
- **6. FOLLOW-UP RESPONSIBILITY:** The Director, Environmental Programs Service (181C), is responsible for the content of this Directive.
- **7. RESCISSION:** This VHA Directive expires August 31, 2004.

Thomas L. Garthwaite, M.D. Acting Under Secretary for Health

Attachments

DISTRIBUTION: CO: E-mailed 8/4/99

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ATTACHMENT A

FORMAT A - SOLID and REGULATED MEDICAL WASTE (RMW)

Preparer's Name:	
Title:	
Service:	
Phone Number:	FAX #:
Station Number:	VISN Number:
	equired to fully list, explain, or complete any portion of this heading and question or subpart number on each page.
referred to Christopher Faldt,	Year (FY) 1999 data to be reported in Format A, are Chief, Environmental Management Service, VA Medical 0) 779-5142, Fax (700) 779-5195.
	olid waste generated in FY 1999 and the total cost for disposal other sections of the report, e.g., hazardous waste, radioactive, cineration, etc.).
1.1. Pounds	
1.2. Cost \$	
2. What method does your facili multiple methods are used, list by	ty use to dispose of its solid waste (landfill, incinerate, etc.)? If y priority of volume.
3. Do you have a current sharing	g agreement for solid waste and/or RMW?
Yes No	

PARTNER	WASTE CATEGORY	<u>POUNDS</u>	COST
·			
Do you have a current co	ontract for waste manageme	nt?	
Yes No			
CONTRACTOR	WASTE CATEGORY	POUNDS	<u>COST</u>
·			
Does your facility proce	ss RMW in-house?		
Yes No			
	 Equipr	nent Brand and Mod	del
	Total Cost \$		
2. Method of Treatment	Equipr	nent Brand and Moo	del
Total Pounds	Total Cost \$		

ATTACHMENT B

FORMAT B - HAZARDOUS	WASTE
Preparer's Name:	
Phone Number:	FAX #:
Station Number:	VISN Number:
v 1 0 1	red to fully list, explain, or complete any portion of this ng and question or subpart number on each page.
	r (FY) 1999 data to be reported in Format B, are al Hygienist, Environmental Programs Service (181C), 5-4283.
1. Provide the name, position, and tit facility.	tle of the Emergency Response Coordinator (ERC) for your
	ency (EPA) designated extremely hazardous substances on- hold Planning Quantity) during FY 1999 and amount of
CHEMICAL	QUANTITY-POUNDS
2.1	
2.2.	
2.3	_
2.4	
2.5	

3. Have you been	required to submit the	EPA Toxic	Chemical	Release Inventory, Form R?	
Yes	_ No				
	ty experienced an emer the last 12 months?	rgency releas	se of extre	nely hazardous or hazardou	S
Yes	_ No				
If yes, complete th	ne following:				
<u>CHEMICAL</u>	LOCATION	<u>DURAT</u>	ΓΙΟΝ .	QUANTITY-POUNDS	<u>5</u>
4.1					
4.2					
4.3					
4.4					
			gency Plan	nning Committee (LEPC)?	
Yes	_ No				
6. Does your facil	lity have a spill control	plan for haz	zardous ma	terials?	
Yes	_ No				
•				th Occupational Safety and ations (CFR) 1910.120?	
Yes	_ No				
-	e to question 7 is yes, loce in accordance with			e team received training and	l
Yes	_ No				
8. Is the spill cont	crol team:				
8.1. Contractor O	perated?	Yes	No		
8.2. Facility Oper	ated?	Yes	No		
8.3. Both Contrac	tor and Facility Opera	ted? Yes	No		

9. Date last che	emical inve	ntory of your fa	acility was conducted:
10. Do you hav	ve active inc	cinerator(s)?	
Yes	#	No	_
List the categor waste, radioacti	• ()		i.e., regulated medical waste, general waste, hazardous
10.1.			
10.2.			
10.3.			
10.4.			
11. Does your Conservation as	-		ste minimization program as required by the Resource
Yes	No		
12. Do you hav	ve a solvent	recovery prog	ram?
Yes	No		
If yes, List the	solvents in	the program:	
12.1			
12.2.			
12.3.			
12.4.			
13. What perce	entage of ha	zardous waste	does your research department contribute to the total our hazardous manifest?
	%		
14. How many	pounds of	Ethelene Oxide	e (EtO) were used at your facility in FY 1999?
Pounds			
15. Do you hav	ve a written	facility Polluti	ion Prevention Plan which meets state requirements?
Yes	No		

16. Do you have a written agreement with your Publicly Owned Treatment Works (POTW) in accordance with 40 CFR 261 and 40 CFR 403.12 (p)?
Yes No
17. Does your facility have certified equipment for chlorofloro carbon (CFC) recovery?
Yes No
18. Does your facility have a trained and licensed operator for CFC recovery?
Yes No
19. Does your facility have a fixed pipe Halon fire extinguishing system?
Yes No
19.1. If yes, how many pounds of Halon remain in your system?
Pounds
19.2. If yes, have you initiated a project for removal?
Yes No
19.3. If yes, what is the projected completion date?
Date
20. Does your facility have portable Halon fire extinguishers?
Yes No
If yes, what is your phase out date?
21. How many pounds of hazardous waste (excluding radioactive waste) were shipped from your facility in FY 1999 as determined from your hazardous waste manifests, and what was the cost?
Total Pounds Total Cost \$
22. What was the cost of asbestos removal and/or disposal at your facility in FY 1999? NOTE: Exclude Full-time Employee Equivalent (FTEE) cost unless removed by in-house asbestos management.
Cost \$

ATTACHMENT C

FORMAT C - RADIOAC	TIVE WASTE
Preparer's Name:	
Title:	
Service:	
	FAX #:
Station Number:	VISN Number:
	quired to fully list, explain, or complete any portion of this eading and question or subpart number on each page.
referred to Michael Simmons, H Sound Health Care System, Pho	(ft3). Useful conversion factors:
	28.32 liters = 1 ft3 0.1337 ft3 = 1 gallon 0.2642 gallon = 1 liter
	amount of radioactive waste generated at your facility for cost the amount of radioactive waste produced at your facility . Responses must be accurate.
1.1. Dry solidft3	
1.2. Biological waste, e.g., carcas	ssesft3
1.3. Absorbedft3	
1.4. Scintillation vials	
1.5. Bulk aqueous liquids	_ft3
1.6. Regulatedft3 exemp	tft3

1.7. Other	ft3		
Mixed hazardous (solvents, uranyl nitrate, uranyl acetate, etc.	ft3		
	ft3		
2. Indicate any on-site treatment methods used to remediate r	radioactive wastes.		
2.1 Decay-in-storage (longest isotope half-life allowed	by license: days)		
2.2 Sewer releases			
2.3 Incineration			
2.4 Compaction			
2.5 Solidification			
2.6. Describe any method not listed in the preceding that is u radioactive waste processing:	sed by your facility for on-site		
NOTE: The information from the following will be used to do			
removal costs. Indicate all costs associated with facility radio	oactive waste removal services.		
3. Total Cost for FY 1999 Radioactive Waste Removal.			
\$			
3.1. Are these costs estimated?			
Yes No			
4. Indicate annual Nuclear Repository Site Use Permit Fee ar	mount: \$		
Site used:			

5. Indicate any other regulatory annual fees associated with radioactive waste disposal:
5.1. \$ for:
5.2. \$ for:
5.3. \$ for:
6. Do you use the services of a waste broker?
Yes No
7. Do you transfer radioactive waste to an affiliate university?
Yes Volume transferred No
7.1. Waste type(s) transferred:
8. List any other off-station treatment options and/or methods (transfer to Department of Energy (DOE), Department of Defense (DOD), incineration, etc.):
9. Is there a written policy for radioactive waste handling/processing/storage/shipping?
Yes No
10. Is there a written local procedure for radioactive waste transfers to an affiliate institution?
Yes No
11. For which departments within your facility are the radioactive waste policies and procedures written (e.g., Research and Development (R&D), Nuclear Medicine, Environmental Management, etc.)?

12. Indicate the FY 1999 costs to your facility for radioactive waste <u>removal</u> services, and the associated volumes of <u>removed</u> waste:

WASTE TYPE	BROKER PROCESSING FEE	BROKER TRANSPORT COST	BURIAL COST	TOTAL COST
.1 DRY SOLID FT3.	\$	\$	\$	\$
.2 ABSORBED LIQUIDS	\$	\$	\$	\$
FT3. ANIMAL FT3.	\$	\$	\$	\$
.3 MIXED HAZARDOUS (SOLVENTS, URANYL NITRATE, ETC.) FT3.	\$	\$	\$	\$
.4 NORM WASTEFT3.	\$	\$	\$	\$
.5 AQUEOUS LIQUIDS FT3.	\$	\$	\$	\$
.6 EXEMPT	\$	\$	\$	\$
.7 REGULATED SCINTILLATION VIALS FT3.	\$	\$	\$	\$
.8 OTHER (SEALED SOURCES, ETC., SPECIFY)	\$	\$	\$	\$

ATTACHMENT D

FORMAT D – I	RECYCLED MATERIAI	LS	
Preparer's Name: _			
Title:			
Phone Number:		FAX #:	
Station Number: _		VISN Number:	
•	al pages are required to fully list the Format heading and questi		• •
referred to Kennet Lexington, KY, Ph	ng the Fiscal Year (FY) 1999 (th Demers, Environmental Ca none (700) 352-4908, Fax (700) A Medical Center, Bedford, P	re Specialist, VA M 352-4970; or David	edical Center Maine, Environmen
Please indicate the associated with each	he FY 1999 items recycled by the item.		
<u>ITEM</u>	COMPONENTS	PROCEEDS(+)/ COST(-)	POUNDS <u>RECYCLED</u>
1.1. Wood:	Pallets, wood furniture, crates and lumber.		
1.2. Corrugated:	Heavy cardboard.		
1.3. White paper:	White office and computer paper.		
1.4. Commingled paper:	All other paper, newspaper, magazines and light cardboard.		
1.5. Glass:	All glass containers; flint is clear, amber is brown and emerald is green. Include all flat glass, e.g., window panes and plate glass.		

<u>ITEM</u>	<u>COMPONENTS</u>	PROCEEDS(+)/ COST(-)	POUNDS RECYCLED
1.6. Metal:	Ferrous (steel, cast iron, tin) non-ferrous (aluminum, brass, copper, lead and appliances).		
1.7. Plastics:	#1 PET, #2 HDPF, #3 PVC, #4LDPE, #5PP, #6 PSS, #7 Other.		
1.8. Rubber:	All rubber products and tires.		
1.9. Batteries:	All auto (lead acid) and all other (dry cell, mercury, lead, cadmium) batteries.		
1.10. Silver:	From the Facility Silver Reclamation Program.		
1.11. Motor oil:	Report used oil in gallons.		
1.12. Fats and consu	mable foods:		
1.13. Compost:	Yard and non-fat food waste items (report in cubic yards).		
1.14. Fluorescent lamps and ballast:	Report in pounds, include "U" tubes and other non-linear bulbs.		
1.15. Textiles:	Mattresses and all by-product materials from the cotton, fiber, textiles and apparel industrie	S.	
1.16. Construction debris:	Asphalt, bricks, concrete wall coverings, drywall, plumbing fixtures, insulation roofing materials, glass, meta wood, and electrical wires.		

<u>ITEN</u>	1	<u>COMPONENTS</u>	PROCEEDS (+)/ COST (-)	POUNDS RECYCLED		
1.17.	Deposit containers:	Any container with deposit value.				
1.18.	Miscellaneous:	Include computer equipment, packing material, etc.				
1.19.	Additional com	ments:				
2. Is	there an active r	ecycling program for resident	ial housing in place?			
	Yes No	o N/A				
3. W	3. What was the total dollar value of revenues for recyclables in FY 1999?					
	\$	<u></u>				
4. Ho	4. How were those revenues identified and utilized?					

5. Provide implementation and recurring costs for FY 1999 initiatives (ror example, Action: Purchased a cardboard bailer; implementation Cost \$6,000; Annual recurring cost: \$100).

<u>ACTION</u>	IMPLEMENTATION COST	RECURRING COST
5.1	_	
5.2	_	
5.3	_	
5.4		
6. Does your facility have a	a designated "Recycling Coordinate	or"?
Yes No		
6.1 If yes, provide the follo	owing information:	
Coordinator's Name:		
Title:		
Organization:		
Phone Number:	FAX #:	
6.2. Percentage of work-ye	ar this person devotes to recycling [program activities:
7. Provide your facility's epulls, reusable, etc.).	stimated cost avoidance in FY 1999	by activity: (i.e., decreased trash
<u>ACTIVITY</u>	AV	/OIDANCE
7.1	<u> </u>	
7.2	<u> </u>	
7.3	<u> </u>	
7.4	<u> </u>	
TOTAL	\$	

8. What percentage of demolition projects managed and/or contracted by your facility included the recovery of construction materials in FY 1999?
%
9. What percentage of your total solid waste was diverted to recycling in FY 1999?
%
10. Indicate solid waste prevention efforts for facilities for which your agency is responsible.
11. Did you institute new solid waste prevention practices in FY 1999?
Yes No
11.1. If yes, provide an explanation of those practices.
11.2. If no, provide an explanation of why not.

ATTACHMENT E

FORMAT E - PROCUREMENT OF RECYCLED PRODUCTS

Preparer's Name:		
Title:		
Service:		
Phone Number:	FAX #: _	
Station Number:	VISN Nur	mber:
NOTE: If additional pages are requirattachment, include the Format heading		1 11
Questions regarding the Fiscal Year referred to Darrel Moore, Operation Center Dublin, GA, -Phone (912) 27	ns Manager, Operatio	ns Service Line, VA Medical
1. Cement and Concrete		
1.1. Total dollar amount of cement pu	rchased by your facility	y in FY 1999.
1.1.1. Without fly ash or slag \$	and in	cubic yards.
1.1.2. With fly ash or slag \$	and in	cubic yards.
1.2. Total dollar amount of concrete p	ourchased by your facili	ty in FY 1999.
1.2.1. Without fly ash or slag \$	and in	cubic yards.
1.2.2. With fly ash or slag \$	and in	cubic yards.
1.3. Were there technical impediment containing fly ash and granulated l		
Yes No		
If yes, provide an explanation of the te	echnical impediment.	

NOTE: As a "Heads Up," incorporation of the total number of contracts for construction and purchase of cement and concrete with fly ash or slag and without fly ash or slag may be included in FY 2000 reporting requirements.

2. <u>Paper and Paper Products.</u> General Services Administration (GSA) and the Government printing Office (GPO) will provide data for agencies' purchases of paper products made through their retail and wholesale stock program. <i>NOTE:</i> Provide amounts for facility purchases from any other source.
2.1. Total dollar amount of paper and paper products purchased by your facility in FY 1999.
\$
2.2. Total dollar amount of paper and paper products containing recycled material purchased by your facility in FY 1999.
\$
3. <u>Motor Vehicle Lubricating Oils.</u> The Defense Logistics Agency (DLA) will provide data for agencies' purchases of paper products made through their retail and wholesale stock program <i>NOTE:</i> Provide amounts for agency purchases from any other sources.
3.1. Total dollar amount of motor vehicle lubricating oils purchased by your facility in FY 1999 NOTE: If vehicle maintenance is accomplished through service contracts that include a standard price for vehicle servicing, report the total number of servicing(s) rather than the dollar value.
\$
3.2. Total dollar amount of motor vehicle lubricating oils containing re-refined oil purchased by your facility in FY 1999. <i>NOTE:</i> If vehicle maintenance is accomplished through service contracts that include a standard price for vehicle servicing, report the total number of services where the vehicle was serviced with re-refined oil rather than the dollar value.
\$
3.3. Were there any technical impediments to increasing the amount of motor vehicle lubricating oils containing re-refined oil purchased by your facility in FY 1999?
Yes No
If yes, provide an explanation of the technical impediment.

5.1. Total dollar amount of building insulation products purchased by your facility in FY 1999.
5. Building Insulation Products 5. 1. Total dellar amount of building insulation and ducts approbaged by your facility in
If yes, provide an explanation for the technical impediment.
Yes No
4.5. Were there any technical impediments to increasing the amount of retread tires purchased by your facility in FY 1999?
4.4 Total number of retread tires purchased by your facility in FY 1999.
\$
4.3 Total dollar amount of retread tires purchased by your facility in FY 1999.
4.2. Total number of tires purchased by your facility in FY 1999.
\$
4.1. Total dollar amount of tires purchased by your facility in FY 1999.
tires. The dollar amount and number of tires should only include those tire categories that are included in the Comprehensive Procurement Guidelines.

4. <u>Retread Tires.</u> Refer to the Federal Supply Schedule for Pneumatic Tires, Federal Supply Class (FSC) Group 26, Part II, Section A for included items. *NOTE:* <u>Do not</u> include exempt

5.2. Total dollar amount of building insulation products containing recycled material purchased by your facility in FY 1999.
\$
5.3. Were there any technical impediments to increasing the amount of building insulation products containing recycled materials purchased by your facility in FY 1999?
Yes No
If yes, provide an explanation of the technical impediment.
NOTE: As a "Heads Up," incorporation of the total number of contracts for construction and purchase of building insulation products and building insulation products containing recycled materials may be included in FY 2000 reporting requirements.
6. Engine Coolants
6.1 For agencies that maintain fleet maintenance facilities, how many fleet maintenance facilities do you operate?
Number
6.1. How many vehicles are maintained?
Number
6.3 Does your facility own and operate anti-freeze recycling equipment?
Yes No
7. Structural Fiberboard and Laminated Paperboard
7.1. Total dollar amount of structural fiberboard and laminated paperboard purchased by your facility in FY 1999.
\$

7.2. Total dollar amount of structural fiberboard and laminated paperboard <u>containing recycled materials</u> purchased by your facility in FY 1999.
\$
7.3. Were there technical impediments to increasing the amount of recycled materials for
Yes No
If yes please provide an explanation of technical impediment.
8. Traffic Cones and Barricades
8.1 Total dollar amount of traffic cones and traffic barricades purchased by you facility in FY 1999.
\$
8.2. Total dollar amount of traffic cones and traffic barricades with recycled content purchased by you facility in FY 1999.
\$
9. <u>Plastic Desktop Accessories.</u> GSA will provide data for facilities purchases of desktop accessories and plastic desktop accessories. <i>NOTE:</i> Provide amounts for facility purchases from any other sources.
9.1. Total dollar amount of desktop accessories purchased by your facility in FY 1999.
\$
9.2. Total dollar amount of <u>recycled content plastic desktop accessories</u> purchased by your facility in FY 1999.
\$

10. <u>Toner Cartridges.</u> GSA and DLA will provide data for agencies' purchases of toner cartridges and recycled toner cartridges. <i>NOTE:</i> Provide amounts for facility purchases from any other sources.
10.1 Total dollar amount of toner cartridges purchased by your facility in FY 1999.
\$
10.2 Total dollar amount of <u>recycled toner cartridges</u> purchased by your facility in FY 1999.
\$
11. <u>Binders (chipboard and plastic covered, not cloth).</u> GSA will provide data for agencies' purchases of binders and chipboard and plastic covered binders. <i>NOTE:</i> Provide amounts for facility purchases from any other sources.
11.1. Total dollar amount of binders purchased by your facility in FY 1999.
\$
NOTE: As a "Heads Up," incorporation of the total number of contracts for construction and purchase of structural fiberboard and laminated paperboard and total number of contracts for construction and purchase of structural fiberboard and laminated paperboard containing recycled content material, may be included in FY 2000 reporting requirements.
12. General
12.1. Does your facility have a policy to remove the requirements for virgin materials and add preference for recovered materials to these service contracts, i.e., including the use of re-refined oil in your vehicle service contracts?
Yes No
12.2. Does your facility have written goals to facilitate achieving established agency goals identified in E.O. 13101 dated September 14, 1998?
Yes No
13. <u>Environmentally Preferable Items</u> . Provide any pertinent information to demonstrate your facility's compliance and commitment to purchase the following items in dollars spent or number of contracts.
DOLLARS NUMBER OF SPENT CONTRACTS
13.1. Carpet (low and medium wear polyester fiber only)

		DOLLARS SPENT	NUMBER OF CONTRACTS
13.2.	Floor tiles (rubber or plastic only)		
13.3.	Patio blocks (rubber or plastic only)		
13.4.	Playground surfaces and running tracks (rubber and plastic only)		
13.5.	Hydraulic mulch (paper and/or wood-based material used for hydroseeding and overspray)		
13.6.	Compost (yard trimmings)		
13.7.	Office recycling and waste containers (plastic, paper, steel)		
13.8.	Plastic trash bags		
Provi	de information on new policies issued; pilot projects,	etc., related to	these seven products.